## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

US BANK TRUST, N.A., AS TRUSTEE OF THE	§	
IGLOO SERIES III TRUST,	§	
Plaintiff,	§	
	§	
	§	
VS.	§	Civil Action No. 4:20-CV-01082
	§	
MICHAEL S. DOUGHERTY, JZAVELA-	§	
ARETHA DOUGHERTY, DATTAJUSTIN	§	
TOSHIHIRO DOUGHERTY-WILLIAMS, AND	§	
INTERNATIONAL BANK OF COMMERCE,	§	
Defendants.	§	

## AGREED MOTION FOR ENTRY OF AGREED JUDGMENT AS TO MICHAEL S. DOUGHERTY

Plaintiff US BANK TRUST, N.A. AS TRUSTEE OF THE IGLOO SERIES III TRUST ("US BANK" or "Plaintiff") and Defendant Michael S. Dougherty ask the Court to enter the Agreed Judgment as to Michael S. Dougherty ("the Agreed Judgment") based upon the agreement of the parties. US BANK and Michael S. Dougherty would respectfully show the Court as follows:

Michael S. Dougherty hereby makes an appearance in the above styled and numbered case for all purposes with the filing of this motion.

The parties to this motion have agreed to the terms set forth in the Agreed Judgment as evidence by the signatures of each party or party's attorney. A court must promptly approve the form of the judgment, which the Clerk must promptly enter, when (1) the jury returns a special verdict, (2) the jury returns a general verdict with answers to written questions, or (3) the Court grants other relief not described in Rule 58(b). Fed. R. Civ. P. 58(b)(2). US BANK and Michael S. Dougherty have agreed to relief not described in Rule 58(b). Thus, the Court should approve the form of the Agreed Judgment and order the Clerk to enter the Agreed Judgment.

US BANK and Michael S. Dougherty ask this Court to approve the Agreed Judgment and order the Clerk to enter the Agreed Judgment.

## **PRAYER**

WHEREFORE, premises considered, US BANK and Michael S. Dougherty request that the Court grant this motion, approve the form of the Agreed Judgment, and order the Clerk to enter the Agreed Judgment filed herewith and attached hereto; and grant all other relief, in law and in equity, to which US BANK is entitled.

Respectfully submitted,

ANDERSON ★ VELA, L.L.P. 4920 Westport Drive The Colony, Texas 75056 214.276.1545 – Telephone 214. 276.1546 – Facsimile

ATTORNEYS FOR PLAINTIFF US BANK

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## **CERTIFICATE OF SERVICE**

I certify that on this the 14th day of September 2020, a true copy of the above document has been delivered in person to the following pursuant to the Federal Rules of Civil Procedure for each party listed below.

ERICK DELARUE 2800 POST OAK BLVD, STE 4100 HOUSTON, TX 77056 VIA E-FILING SERVICE AND/OR AND/OR BY US MAIL – CMRRR and/or by E-Mail: erick.delarue@delaruelaw.com

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INTERNATIONAL BANK OF COMMERCE ATTN: DENNIS NIXON 3800 MAPLE AVE. DALLAS, TX 75219 BY REGULAR US MAIL

By: <u>/s/ RICHARD E. ANDERSON</u>
RICHARD E. ANDERSON